



BOSTON CONNECTICUT FLORIDA NEW JERSEY NEW YORK PROVIDENCE WASHINGTON, DC

**MEMO ENDORSED**

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April 4, 2024

**VIA E-FILING**

Hon. Jessica G. L. Clarke, U.S.D.J.  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Shukla v. Google LLP, Deloitte Consulting LLP, et al.  
Civ. No. 1:24-cv-02470 (S.D.N.Y.)

Dear Judge Clarke:

We represent Defendant Deloitte Consulting LLP (“Deloitte”) in the above-captioned matter (“Shukla VII”). We write to the Court to request that the Court stay any action in Shukla VII, including Deloitte’s response to the Complaint, until the disposition of Deloitte’s pending Motion to Dismiss in related case *Shukla v. Deloitte Consulting LLP*, et al., 23-cv-10150, ECF No. 37 (“Shukla VI”).

Pursuant to Rule 81(c)(2), Deloitte’s response to the Complaint in Shukla VII is due by no later than Monday, April 8, 2024. However, the Complaint in Shukla VII, which notably contains 860 paragraphs and 20 counts against Deloitte and Defendant Google LLP, consists of the same and substantially similar claims as the claims asserted by plaintiff in the complaint in the related case, Shukla VI, and in lawsuits previously filed by plaintiff against Deloitte that have since been dismissed. For example, in the Shukla VII Complaint and in the complaint in the related case Shukla VI, plaintiff alleges, among other things, that Deloitte discriminated against him because of his race, gender, and alleged disability during his employment at Deloitte and conspired with other employers to prevent plaintiff from obtaining employment with those other employers. Notably, as Deloitte explained in the pending Motion to Dismiss in Shukla VI (23-cv-10150, ECF No. 37 at 2), in 2019, plaintiff alleged in the first complaint he filed against Deloitte (*Shukla v. Deloitte Consulting LLP*, No. 19-cv-10578 (S.D.N.Y.) (Shukla I) (ECF No. 53-2)) that Deloitte conspired with Google to prevent plaintiff from obtaining employment with Google. These are the same allegations set out in Shukla VII.



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Accordingly, given the relatedness of the claims in Shukla VI and Shukla VII and the substantial overlap in the facts alleged and claims asserted by plaintiff, Deloitte respectfully requests that the Court stay any action in this case Shukla VII, including Deloitte's response to the Complaint, until the disposition of Deloitte's pending Motion to Dismiss in related case Shukla VI. Deloitte is also available at the Court's convenience for a conference with the Court to discuss this matter.

Deloitte requested that plaintiff consent to its request that the Court stay this matter pending the disposition of Deloitte's Motion to Dismiss in the related case, but plaintiff refused to consent to our request because he believes there is no relation between the two cases and that the claims are "entirely different" which is plainly untrue. The April 3, 2024 e-mail exchange between Deloitte's counsel and plaintiff in which Deloitte sought plaintiff's consent is attached hereto as Exhibit A. Deloitte has not sought any other relief or requests from the Court in this matter.

We thank the Court for its time and attention to this matter.

Application GRANTED. The Court STAYS this matter until the disposition of Deloitte's pending Motion to Dismiss in related case Shukla v. Deloitte Consulting LLP, et al., 23-cv-10150, ECF No. 37.

SO ORDERED.

A handwritten signature in blue ink that reads 'Jessica Clarke'.

JESSICA G. L. CLARKE  
United States District Judge

Dated: April 5, 2024  
New York, New York

Respectfully submitted,

A handwritten signature in black ink that reads 'Heather Weine Brochin'.

Heather Weine Brochin

cc: Pro Se Plaintiff Ashu Shukla (via ECF and Mail)